

# EXHIBIT A

PERSONAL INJURY

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF ANOKA

TENTH JUDICIAL DISTRICT

Elaine E. Kollar,

Plaintiff,

**SUMMONS**

vs.

Home Depot U.S.A., Inc.,

Defendant.

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THE STATE OF MINNESOTA TO THE ABOVE-NAMED DEFENDANT:

**1. YOU ARE BEING SUED.** The Plaintiff has started a lawsuit against you. The Plaintiff's Complaint against you is attached to this Summons. Do not throw these papers away. They are official papers that affect your rights. You must respond to this lawsuit even though it may not yet be filed with the Court and there may be no court file number on this Summons.

**2. YOU MUST REPLY WITHIN 21 DAYS TO PROTECT YOUR RIGHTS.** You must give or mail to the person who signed this Summons a written response called an Answer within 21 days of the date on which you received this Summons. You must send a copy of your Answer to the person who signed this Summons located at: 901 Marquette Avenue, Suite 500, Minneapolis, MN 55402-3205.

**3. YOU MUST RESPOND TO EACH CLAIM.** The Answer is your written response to the Plaintiff's Complaint. In your Answer you must state whether you agree or disagree with each paragraph of the Complaint. If you believe the Plaintiff should not be given everything asked for in the Complaint, you must say so in your Answer.

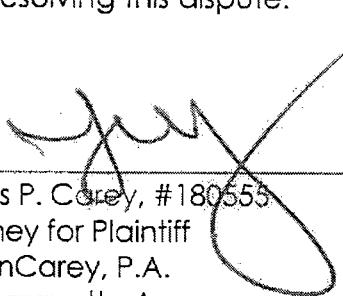
**4. YOU WILL LOSE YOUR CASE IF YOU DO NOT SEND A WRITTEN RESPONSE TO THE COMPLAINT TO THE PERSON WHO SIGNED THIS SUMMONS.** If you do not Answer within 21 days, you will lose this case. You will not get to tell your side of the story, and the Court may decide against you and award the Plaintiff everything asked for in the Complaint. If you do not want to contest the claims stated in the Complaint, you do not need to

respond. A default judgment can then be entered against you for the relief requested in the Complaint.

**5. LEGAL ASSISTANCE.** You may wish to get legal help from a lawyer. If you do not have a lawyer, the Court Administrator may have information about places where you can get legal assistance. Even if you cannot get legal help, you must still provide a written Answer to protect your rights or you may lose the case.

**6. ALTERNATIVE DISPUTE RESOLUTION.** The parties may agree to or be ordered to participate in an alternative dispute resolution process under Rule 114 of the Minnesota General Rules of Practice. You must still send your written response to the Complaint even if you expect to use alternative means of resolving this dispute.

Dated: 6/28/21

  
\_\_\_\_\_  
James P. Carey, #180555  
Attorney for Plaintiff  
SiebenCarey, P.A.  
901 Marquette Avenue  
Suite 500  
Minneapolis, MN 55402-3205  
612-333-4500  
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106721/Summons

PERSONAL INJURY

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF ANOKA

TENTH JUDICIAL DISTRICT

Elaine E. Kollar,

Court File No.

Plaintiff,

vs.

**COMPLAINT**

Home Depot U.S.A., Inc.,

Defendant.

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PLAINTIFF FOR HER CLAIM FOR RELIEF, STATES AND ALLEGES AS FOLLOWS:

I.

That, at all times material hereto, Plaintiff Elaine E. Kollar was a resident of the State of Minnesota.

II.

That, at all times material hereto, Defendant Home Depot U.S.A., Inc. was, and is, a foreign corporation licensed to do business in the State of Minnesota and was in fact doing business in the State of Minnesota.

III.

That, on or about May 04, 2021, Plaintiff Elaine E. Kollar was caused to fall while lawfully on the premises owned, possessed, and managed by Defendant Home Depot U.S.A., Inc.

IV.

That, said fall was the result of the negligence and carelessness of Defendant Home Depot U.S.A., Inc.

V.

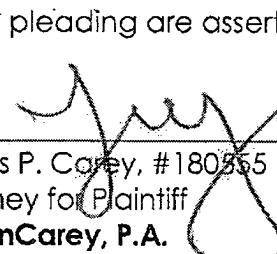
As a direct and proximate result of the negligence and carelessness of Defendant Home Depot U.S.A., Inc., Plaintiff Elaine E. Kollar sustained severe and permanent injuries in mind and body, and medical expenses, all of which problems are continuing in nature, resulting in damage to her in an undetermined sum at this time.

**WHEREFORE**, Plaintiff Elaine E. Kollar demands judgment against Defendant Home Depot U.S.A., Inc., herein for a reasonable sum in excess of Fifty Thousand (\$50,000.00) Dollars, together with interest, costs and disbursements herein.

ACKNOWLEDGMENT

The undersigned hereby acknowledges that costs, disbursements, and reasonable attorney and witness fees may be awarded pursuant to Minn. Stat. §549.211 to the party against whom the allegations in this pleading are asserted.

Dated: 4/28/21

  
James P. Carey, #180355  
Attorney for Plaintiff  
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106721/PLC1